

HOGAN LOVELLS US LLP
Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

– and –

M. Hampton Foushee (*pro hac vice*)
hampton.foushee@hoganlovells.com
875 Third Avenue
New York, New York 10022
Tel: (212) 918-3000
Fax: (212) 918-3100

*Counsel for Party in Interest
esVolta, LP.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

***All papers shall be filed in the Lead Case,
No. 19-30088 (DM)**

Bankruptcy Case
No. 19 – 30888 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN
ESVOLTA, LP AND OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS EXTENDING TIME TO
RESPOND TO SAFE HARBOR
MOTION TO BE HEARD ON APRIL
10, 2019**

[No Hearing Requested]

This stipulation and agreement for order (“Stipulation and Agreement for Order”) is entered into by esVolta, LP (“esVolta”) on the one hand, and the Official Committee of Unsecured Creditors (the “Creditors Committee”) on the other. esVolta and the Creditors

Committee are referred to in this Stipulation and Agreement for Order collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On March 20, 2019, esVolta filed a notice of hearing (the “Notice”) [Dkt. 980] noticing the *Motion and Memorandum of esVolta, LP for Entry of an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556* (the “Motion”) [Dkt. 977] for a hearing before the Court at 1:30 p.m. on April 10, 2019.

B. Counsel for the Creditors Committee has requested, and counsel for esVolta has agreed, that the time for the Creditors Committee to file any response or opposition to the Motion (any such response or opposition, a “Creditors Committee Response”) be extended.

C. Additionally, counsel for esVolta has requested, and counsel for the Creditors Committee has agreed, that the time for esVolta to reply to a Creditors Committee Response be correspondingly extended.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time for the Creditors Committee to file and serve any Creditors Committee Response is extended through 4:00 p.m. (Pacific Time) on April 5, 2019.

2. The time for esVolta to reply to any such Creditors Committee response is extended through 12:00 p.m. (Pacific Time) on April 9, 2019.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 27, 2019	Dated: March 27, 2019
HOGAN LOVELLS US LLP	MILBANK LLP
By: <u>/s/ Erin N. Brady</u> Erin N. Brady (CA 215038)	By: <u>/s/ Thomas R. Kreller</u> Thomas R. Kreller (CA 161922)
<i>Attorneys for esVolta, LP</i>	<i>Attorneys for Official Committee of Unsecured Creditors</i>